

# EXHIBIT 3



1 as you know, they were telling you the incidence was not  
2 available, right?

3 A. That's correct.

4 Q. If Abbott was aware of that information and didn't tell  
5 you, do you believe that as a physician, you were adequately  
6 warned?

7 A. No.

8 Q. I want to talk to you, Doctor, about a couple other things.  
9 You were visited by sales representatives from Abbott from time  
10 to time, right?

11 A. They would come through El Hogar, yes.

12 Q. Sure. And would they leave literature, materials, printed  
13 information?

14 A. Yes.

15 Q. Did they leave actual published studies from time to time?

16 A. Yeah.

17 Q. Okay. Those were about the benefits of the drug or ways to  
18 prescribe it, right?

19 A. Yes.

20 Q. In your time at El Hogar or any time you saw an Abbott  
21 sales representative, do you recall them leaving you  
22 information not about the benefits, but about the increased  
23 risk of birth defects with this drug?

24 A. No.

25 Q. And I'm talking about this 10 percent.

REPORTER'S CERTIFICATE

I, Molly N. Clayton, RPR, FCRR, Official Court Reporter for the U.S. District Court, Southern District of Illinois, do hereby certify that I reported with mechanical stenography the proceedings contained in pages 1121 - 1259; and that the same is a full, true, correct and complete transcript from the record of proceedings in the above-entitled matter.

DATED this 5th day of June, 2017.

*s/Molly Clayton, RPR, FCRR*

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